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March 15, 2023

BY ECF

The Honorable Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Valencia Rocha et al., 21 Cr 236 (AKH)

Dear Judge Hellerstein:

We represent Charles Burrill in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A. On August 23, 2022, pursuant to a plea agreement, Mr. Burrill pleaded guilty to one count in a superseding information charging him with violating 18 U.S.C. Section 371. Following the plea proceeding, Mr. Burrill returned to his home in Oregon. He has remained in full compliance with his release conditions.

We write, without objection from the Government, to respectfully request a 60-day adjournment of Mr. Burrill's sentencing. I am starting a trial on March 20, 2023 in New York County in the matter of *People v. Roberto Soto*. As such, I have been engaged in trial preparation over the last few weeks. Furthermore, we continue to be in the process of gathering information from Mr. Burrill's family members and friends, related to his history and background, his positive characteristics, and other important mitigating information. As such, an adjournment is necessary to complete our work for sentencing.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti
Shannon McManus
Kestine Thiele

*Sentencing is adjourned
to June 1, 2023
at 11:00am
3-16-23
[Signature]*